

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

JUN 28 A 10:25

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

for the

District of Nevada

Division Reno

Case No. 3:24-cv-00276

CHRISTOPHER JAHN

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

TESLA, INC.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR EMPLOYMENT DISCRIMINATION**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	CHRISTOPHER JAHN
Street Address	1532 CHESTER SQ
City and County	SPARKS WASHOE COUNTY
State and Zip Code	NEVADA 89431
Telephone Number	(775) 224-9031
E-mail Address	<u>CHRIS.S.JAHN@GMAIL.COM</u>

Filed	Received	Entered	Served On
Counsel/Parties of Record			
JUN 28 2024			
Clerk US District Court District of Nevada			
By:		Deputy	

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

Defendant No. 1

Name	TESLA, INC.
Job or Title <i>(if known)</i>	
Street Address	901 PAGE AVE
City and County	FREMONT
State and Zip Code	CALIFORNIA 94538
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

Name	TESLA, INC.
Street Address	1 ELECTRIC AVE
City and County	SPARKS WASHOE COUNTY
State and Zip Code	NEVADA 89434
Telephone Number	

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to *(check all that apply)*:

Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17
(race,
color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

Other federal law *(specify the federal law)*:

Relevant state law *(specify, if known)*:

(NRS 453.554) (NRS 453.556) (NRS 453.566)

Relevant city or county law *(specify, if known)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. The discriminatory conduct of which I complain in this action includes *(check all that apply)*:

Failure to hire me.

Termination of my employment.

Failure to promote me.

Failure to accommodate my disability.

Unequal terms and conditions of my employment.

Retaliation.

Other acts *(specify)*:

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

- B. It is my best recollection that the alleged discriminatory acts occurred on date(s)

SEPTEMBER 21 2023

- C. I believe that defendant(s) *(check one)*:

is/are still committing these acts against me.

is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my *(check all that apply and explain)*:

race

color

gender/sex

religion SEE BELOW/ATTACHED

national origin

age *(year of birth)* *(only when asserting a claim of age discrimination.)*

disability or perceived disability *(specify disability)*

E. The facts of my case are as follows. Attach additional pages if needed.

On September 21 2023 the defendant terminated the plaintiff's employment at approximately 11:30AM citing drug paraphernalia allegedly seen in the plaintiff's vehicle on September 20 2023.

The morning of September 20 2023 the plaintiff reported late to scheduled shift start at 6:00AM due to a medical event and religious observation that did not occur on company property. An Officer of the Storey County Sheriff's Department responded to concerns of nearby pedestrians with the interaction concluding at 7:15AM. No citations were issued proceeding the interaction. Documentation of the Incident Report was later obtained.

Prior to the termination of the plaintiff an internal investigation was opened on behalf of another employee against the plaintiff regarding Case No. 23 PO 00130 3F filed in the Justice Court of Canal Township in and for the County of Lyon, State of Nevada.

Additional Documentation will be included.

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

JANUARY 12 2024

B. The Equal Employment Opportunity Commission *(check one)*:

has not issued a Notice of Right to Sue letter.

issued a Notice of Right to Sue letter, which I received on *(date)* **03/31/2024**

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:

60 days or more have elapsed.

less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The plaintiff requests the following relief in preferential order;

- 1) Reinstatement of employment; a possibility as noted in the defendant's drug policies.
- 2) Elevation to hourly wage of impacted career; \$32.03 (\$29.12 and differential of 10%)
- 3) Compensation of lost wages as calculated;

From the dates of;

September 21 2023 - January 02 2024 calculated as 44 hours per week at \$21.50 for a total of \$946 per week for 15 weeks resulting in; \$14,025.00;

January 02 2024 - June 29 2024 a difference in wages calculated as 40 hours per week at \$17.00 resulting in; \$680.00. Per week difference calculated as \$946 minus \$680 per week for a total of \$266 per week for 26 weeks resulting in; \$6,916.00.

A Total sum of \$20,941.

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

JAN 28 AM 10 15

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass or to cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A

For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

Signature of Plaintiff



Printed Name of Plaintiff

CHRISTOPHER JAHN

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

San Francisco District Office
450 Golden Gate Avenue 5 West, PO Box 36025
San Francisco, CA 94102
(650) 684-0910
Website: www.eeoc.gov

DETERMINATION AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161, 161-A & 161-B)

Issued On: 03/31/2024

To: Mr. Christopher S. Jahn
1532 Chester Square
SPARKS, NV 89431
Charge No: 550-2024-00830

EEOC Representative and email: AKIBA BRADFORD
Investigator
Akiba.Bradford@eeoc.gov

DETERMINATION OF CHARGE

The EEOC issues the following determination: The EEOC will not proceed further with its investigation and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign in to the EEOC Public Portal and upload the court complaint to charge 550-2024-00830.

On behalf of the Commission,

Scott Doughtie

FOR: Nancy A. Sienko
District Director



STOREY COUNTY SHERIFF'S OFFICE

CAD INCIDENT REPORT

2309200004

Page 1
11-29-24

Location PILOT TRAVEL CENTER # 1359, 400 USA PARKWAY				Cross Streets BRITAIN DR/FORT LENO		City MCCARRAN	
Incident Type DUI - DRUNK IMPAIRED DRIVER (REDI)				Call Taker S055		Dispatcher S055	
Date 06/20/2023	Priority 1	Primary Unit 5179	Beat 5	Fire Zone S1	Area 7	Map S05	Source 911 CALL
Caller Name		Caller Address				Caller Phone	
Dispositions Action Taken (Case #)				Weapon		Alt Level	
Vehicles 2021 Black Subaru Crosstrek, CW9A3B NV				Associated Incidents			
Incident Times		Special Circumstances					
Received	06:40:44						
Created	06:54:33						
Dispatched	06:54:39	Persons	Sex	DOB	Race	DL	
In Route	06:54:42	John Christopher Steven		M	05/09/1993		
On Scene	06:56:57						
Closed	07:15:05						
Rev'd-Closed	25:21						
Unit Times	Deparities	Dispatched	Enroute	On Scene	Clear	Disp-On Scene	Enrt-On Scene
5179	S179	06:54:39	06:54:42	06:56:57	07:15:05	02:18	02:15
						18:08	20:26

Incident Comments

CK FOR A BLACK SUBARU CROSS TREK SPORT- WMA BEARD - TALL SKINNY WMA - WEARING A GRAY HOODIE JEANS BASEBALL CAP- VEH IS LOC AT THE FAR END OF THE PARKING BACK RIGHT RP CONCERNED THE SUBJ MAY DRIVE- SUBJ WAS OBSERVED SMOKING SOMETHING OUT OF A BOWL AND THEN VOMITING OUTSIDE HIS VEH SUBJ WENT INTO THE STORE

TIME	#	EVENT	BY
06:54:33	1	Incident initiated at Pilot Travel Center # 1359, 400 USA Parkway, McCarran	S055
06:54:34	2	DSPT Veh. CW9A3B/NV	S055
06:54:35	3	Sending Incident to OI Pager	S055
06:54:39	4	5179 DISP. Pilot Travel Center # 1359, 400 USA Parkway, McCarran	S055
06:54:42	5	5179 10-76.	S055
06:56:57	6	5179 10-23.	S055
07:00:08	7	5179 DSPT Veh. CW9A3B/NV	S055
07:03:41	8	5179 JAHN, CHRIS TOPHER STEVEN (05/09/1993)	S055
	9		
07:07:41	10	5179 DSPT Name: JAHN,CHRISTOPHER STEVEN	S055
07:05:05	11	ADVISED OF DETAILS- VIOLENCE/WEAPONS ON AN EXP IPO	S055
07:05:13	12	5179 CODE 4	S055
07:09:29	13	5179 CODE 4	S055
07:14:20	14	5179 MEDICAL ISSUE/NEG DRUGS/HE IS ON THE WAY TO WORK	S055
07:15:05	15	5179 10-8 CONTACT MADE/NEG 10-55 - MEDICAL ISSUE	S055
07:15:05	16	5179 Closed - Disposition AT	S055
07:15:07	17	Sending Incident to OI Pager	S055

DEP. SNOW



June 28, 2023
To: Christopher Jahn
Re: Employee Change Notification

Dear Christopher,

This is to inform you of the following change in your employment at Tesla:

Effective Date : July 10, 2023
Base Pay : USD 21.50 Hourly

We look forward to transitioning the world to sustainable energy with you. Your employment at Tesla remains at-will and the company continues to reserve the right to modify your title, manager, location, shift, compensation and benefits from time to time, as it deems necessary.

If you have any questions, please feel free to contact your HR Partner.

Paul Shelly
Production Supervisor



Chris Jahn <chris.s.jahn@gmail.com>

Panasonic - Shift Lead Next Steps!

Cassandra Ferguson <notification@jobvite.com>
Reply-To: Cassandra Ferguson <j41hn7hsl@jobvite.com>
To: Christopher Jahn <chris.s.jahn@gmail.com>

Thu, Oct 12, 2023 at 9:31 AM



Assembly Shift Lead | D Shift (PENA)
Panasonic Energy of North America

Hello Christopher ,

I have reviewed your application for employment with Panasonic Energy of North America for our Shift Lead position.

This position has an hourly pay rate of \$29.12.
Our night shift employees are provided a 10% Shift Differential in addition to the hourly rate of pay.

We are looking for a Shift Lead who has a strong desire to learn and understand processes, inspire and encourage team members, lead with safety in mind and bring forth new ideas. We are hoping to find an individual who aspires to eventually develop into a Supervisor and become a changemaker with us at Panasonic.

Our Shift Leads must encompass our 7 Principles:

1. **Contribution to Society**
We will follow the Basic Management Objective for society's benefit.
2. **Fairness and Honesty**
We will be fair and honest in all our business dealings and personal conduct.
3. **Cooperation and Team Spirit**
We will combine our abilities to accomplish our shared goals together and value team spirit.
4. **Untiring Effort for Improvement**
We will try to improve our business ability to contribute to society.
5. **Courtesy and Humility**
We will always be cordial and modest and respect others for good social relationships.
6. **Adaptability**
We will continually adapt our thinking and behavior to meet the ever-changing conditions around us.
7. **Gratitude**
We will act out of a sense of gratitude for all the benefits we have received

To prepare yourself for our interview, please watch this 6 minute video:
Meet Mr. Matsushita